SPILL PREVENTION CONTROL

AND COUNTERMEASURE PLAN

FOR

FORD MOTOR COMPANY

BUFFALO STAMPING PLANT

Prepared By: Ford Motor Company
Buffalo Stamping Plant
Plant Layout Section
Plant Maintenance Services

Updated and Amended July 1986

314947

SPILL PREVENTION CONTROL AND COUNTER MEASURE PLAN

FORD MOTOR COMPANY
BUFFALO STAMPING PLANT
S-3663 LAKE SHORE ROAD
BUFFALO, NEW YORK 14219

Reviewed and certified by:

July 1986

R. J. Kenyon, P.E.
Michigan Registration 07985
July 1986

SECTION I

PLANT OPERATION

SECTION I: PLANT OPERATION

A. MATERIAL STORAGE

There are five major classes of potential polluting materials stored at the Buffalo Stamping Plant. The storage method and maximum quantity are as follows. A sketch showing the location of each material within plant grounds is included in section VII. The identification numbers on the location map match the item numbers in this section.

1. #6 Fuel Oil (No. 1a and 1b)

Two 250,000 gallon storage tanks are located in separate depressed and diked areas, serviced by sump pumps connected to our Waste Treatment Facility. Dike capacity approx. 3 times capacity of one tank.

2. Waste Oil and Sludge

a. Two 20,000 gallon, above ground, industrial waste batch treatment tanks are located within a concrete wall - having approx. 120% capacity of one tank.

b. One 30,000 gallon, above ground, industrial waste batch treatment tank is located within a concrete wall - having approx. 140% capacity.

c. Two 10,000 gallon, above ground storage tanks containing waste oil (2c,s) in one and sludge (2c,n) in the other. These tanks are located within a concrete wall having approx. 120% capacity of one tank.

d. 1. One 36,470 gallon tank divided into (6) compartments at the Oil Separation Center. These compartments are all located in a recessed well which has a capacity of approx. 120% of the largest tank.

2. Four 1000 gal. tanks for temporary storage of water and oil mixture if the main receiving tank is full.

3. Seven 1000 gal. tanks for temporary storage of oils awaiting to be centrifuged for reuse.

e. One 11,000 gallon above ground storage tank presently not in use but is available for waste oil if needed. The tank is located in a concrete diked area with (3) tanks used for process oils. The tank is filled by a pumping station adjacent to the dike wall. The dike containment capacity is 150% of the combined tank capacities.

f. One 250 gal. underground storage tank for waste oil skimmed off the water passing through the Storm Sewer Lagoon.

3. Process Oils:

a. One 11,000 gallon above ground storage tank for thread cutting oil (M99C47A).

b. Two 11,000 gallon above ground storage tanks for lubrication oils.

Note: These three tanks, plus one listed in item 2-e are located within a concrete wall having approx. 150% of the combined capacity of all four tanks.

c. Approximately sixty 55 gallon drums of lubrication oil are stored either in the plant barrel storage building or at the plant Oil Separation Center.

4. Gasoline - (un-leaded) and Diesel Fuel

a. One 10,000 gallon underground storage tank for gasoline.

? b. One 550 gallon above ground storage tank (covered and curbed) for diesel fuel.

? c. One 350 Gallon above ground tank (sheltered and curbed) for diesel fuel.

5. Solvents and Degreasers

a. Paint solvents (lacquer thinner) are stored in a cabinet in (5) gal. containers. Waste solvent is poured in a 55 gal. drum located in the Carpenter Shop at Column V-29 and disposed of by an outside vendor. Paint solvent is also stored in a crib in the Barrel Storage Building prior to use, max. (10) 5 gal. cans.

b. Degreasing agents are used in (8) cleaning units located around the plant. Five cleaning units contain 10 gal. of solvent, two contains 100 gal. and one contains 200 gal. These units are serviced by an outside vendor who replaces and disposes of solvent on a regular schedule.

c. Additional degreasing materials such as inhibited 1.1.1 trichloroethane and ethyl alcohol are stored in the Barrel Storage Building in 5 gal. containers prior to use for special cleaning purposes in the Tool and Die Shop. Storage capacity of these materials is generally less than 25 gal. total.

B. TRANSPORTATION

These materials are transported to or from the plant by one of the following methods:

Bulk tanker trucks having a maximum capacity of 7,400 gallons which empty or fill above and below ground tanks. Bulk loading and unloading is attended by plant personnel.

Common carrier trucks carrying 55 gal. drums and other containers meeting ICC regulations.

C. CONSUMPTION

1. Fuel oil (#6) is pumped directly from the storage tanks (1a & 1b) into the steam boilers by a 20 GPM steam operated pump which is controlled by a push button station. The steel pipe line from the storage tanks is encased in a pre-sealed conduit which runs underground from the storage tanks to the boiler house.

2. Waste Oil and Sludge

   a. The industrial waste treatment batch tanks (2a and 2b) are filled by steel pipes which run underground from the main building and the boiler house. The tanks are filled alternately with the full tank receiving treatment, while the other tank fills. Once a tank is full, free oils are skimmed off the top and stored in a separate 10,000 gallon tank (2c,N) which is emptied as required. The remaining fluid is then treated with ferric sulfate and lime to remove mechanically emulsified oils. This chemical treatment forms a flock or sludge which is drained off and stored in another 10,000 gallon tank (2c,S). The sludge tank is also emptied as required. The water remaining after this treatment is drained to the sanitary sewer system.

   b. Waste oils and water picked up around the plant are brought to the Oil Separation Center. Here they are dumped into a 9,300 gal. receiving tank where free oils are allowed to rise to the top and are skimmed off by belt tube type skimming units. The skimmed oils are stored in two sludge tanks which are 3,775 gal. and 2,070 gal. capacity. This sludge is picked up as necessary by a waste disposal company. The remaining liquid is then transferred to a 7,800 gal. process tank which is run through an "Abcor" Ultrafiltration Unit which separates the water from the oils. The water is discharged to the sanitary sewer. The remaining oils are put in the sludge tanks for disposal. All tanks in this operation are in a recessed well which acts like a dike.

C. Consumption (continued)

c. The Storm Water Lagoon has an oil skimming device to remove oils trapped by the system. These oils are collected and stored in a 250 gal. underground tank located on the north side of the lagoon. This tank (2f) is emptied as required by plant personnel and the oils are taken to the Oil Separation Center oil storage tank for disposal by an outside vendor.

3. Process Oils

a. The one thread cutting oil tank (3a) is filled by bulk tanker trucks which connect to a filling pump located adjacent to the storage tanks. The oil is fed to an in-plant dispensing station by an underground steel pipe.

b. Hydraulic oil is stored in 55 gallon drums and kept in the barrel storage building until required in the plant. The drums are brought to the main building either singly or pallets of four, by fork truck and distributed to various locations.

c. Lubrication oils are stored in 55 gallon drums and kept in the barrel storage building until required in the plant. The drums are brought to the main building either single or pallets of four, by fork truck and distributed to the various lubrication cribs. The drums are emptied into oiling cans by hand operated pumps.

4. Gasoline

a. A 10,000 gallon underground tank (4a) located outside the Executive Garage is filled by a bulk tanker through a ground level filling port. The gasoline is dispensed by a pump located approximately 20 feet south of the tank. The pump is fed by an underground steel pipe. Gasoline usage is checked by keeping records of pump readings.

b. A 550 Gal. diesel fuel tank (4b) is located in an outside die storage area for us in fueling a mobil crane. The tank is inside a concrete pad with a curb high enough to contain 125% of the tank capacity. The crane is filled with a hand operated pump mounted to the storage tank. Refilling of the storage tank is done by a bulk tanker.

c. A 350 gal. diesel fuel tank (4c) is located in the pump building adjacent to a 400,000 gal. water storage tank. The fuel is used to operate the fire protection system pump motors. The tank is diked with a concrete curb and is refilled by a bulk tanker as required.

SECTION II

ANALYSIS OF POLLUTION INCIDENTS

SECTION II: ANALYSIS OF POLLUTION INCIDENTS

A. POLLUTION INCIDENT POTENTIAL

1. Utility Failure

In the event of an electrical outage at the plant, no additional potential to pollute would exist. There are no electrically operated valves or closure devices which would automatically open if power were cut off.

2. Bulk Storage

Bulk storage tanks, aboveground containing #6 oil, waste oil, sludge, thread cutting oil and hydraulic oil, are all aboveground tanks surrounded by earthen or concrete dikes with capacities greater than any single tank enclosed. All storm sewer receivers inside the diked areas pump their discharge to the Industrial Waste Treatment Facility. All tanks are equipped with visual depth gauges or pressure gauges to monitor tank depth. The pickup point for the industrial wate treatment facility waste oil and sludge tanks has a drain to catch any spilled material and return it to the batch tank currently being filled. All exterior receiving and dispensing pump systems are housed in shelters.

All bulk storage tanks underground contain either waste oil or gasoline. All waste oil tanks are filled by steel pipe lines which run underground from curbed receivers in the plant or by direct dumping into their access covers. The tanks are emptied by a waste disposal company by pumping the waste oil from the tanks, through ground level access covers, into the tank trucks.

Drum storage areas are not curbed either inside the plant or in the barrel storage building. However, the floor drains in the barrel storage building have been plugged to prevent spilled materials from entering the storm sewer there.

Since many materials are transported around the plant in 55 gallon drums, there is always the potential of an accidental spill occuring in an uncontrolled area and entering the storm sewer system. In order to intercept any accidental spills, to minimize possible oil spills from leaving plant property, a stormwater lagoon, with under flow capabilities has been constructed in one of the primary sewer lines. Additionally a floating boom and an oil skimmer has been placed in operation to retrieve accumulated oils.

3. Flooding

The location of the Buffalo Stamping Plant eliminates the possibility of contamination due to flooding.

4. Security

The plant Security Office is manned 24 hours per day, 365 days per year. Security officers patrol both in-plant grounds and parking facilities on all three shifts. The main entrances are monitored on closed circuit TV. A 6 ft. chain link fence topped with barbed wire completely encloses the plant property. All visitors must check in with Plant Security before being granted admittance to the plant grounds.

B. HISTORY OF POLLUTION INCIDENTS

Copies of the Incident Reports for the following can be found in Section VII.

1. February 11, 1977, an unknown quantity of oil was accidently discharged into the stormwater system and eventually to Lake Erie. A copy of the pollution incident report, describing the cause and corrective action taken, is enclosed as part of this plan, see Section VII. THis pollution incident was caused by unique weather conditions and a recurrence is highly unlikely.

2. July 5, 1977, an unknown quantity of oil was detected behind our floating booms located at storm sewer outfall to drainage ditch.

3. April 5, 1978, a small quantity of oil was discovered by U.S. Coast Guard personnel who called the plant to clean it up.

4. May 14, 1979, an unknown quanity of oil was detected behind our floating booms located at storm sewer outfall to drainage ditch.

5. Sept. 19, 1985, a small quantity of oil was detected at our storm sewer outfall by a "concerned citizen" who reported it to the U.S. Coast Guard.

6. May 27, 1986, a small quantity of oil was detected at the storm sewer outfall by a powerhouse employe.

7. June 1, 1986, a small quantity of oil was detected at the storm sewer outfall by a powerhouse employe.

SECTION III

EMERGENCY CALL LISTS

SECTION III: EMERGENCY CALL LISTS

A. FORD PERSONNEL

Ford personnel are instructed to immediately contact the Plant Security Office to report all spill incidents. Plant Security maintains an up-to-date emergency call list and can contact the proper persons during work hours and at home. The Security Office is maned 24 hours per day, 365 days per year.

A plant environmental representative has been assigned overall responsibility in coordinating responses to pollution incidents. He is the person Plant Security has instructions to contact immediately in the event of a spill, and he in turn, instructs Plant Security officers to make contact with others listed on the emergency call list. The list is as follows:

1. Plant Security Office
   Buffalo Stamping Plant, Body & Assembly Division
   S-3663 Lakeshore Road, Buffalo, N. Y. 14219
   (716) 821-4014, 4015 or 4002

2. J. R. Suyak, Emergency Clean-up Co-ordinator
   Office: area code - 716 - 821-4008
   Home: area code - 716 - 688-4917

3. A. W. Toth, Designated Plant Environmental Representative
   Office: area code - 716 - 821-4089
   Home: area code - 716 - 649-1536

Additionally the Plant Environmental Representative is to Contact the following company personnel;

Stationary Source Environmental Control Office (SSECO)

John Van Dyke
Office: (313) 322-5548
Home: (313) 453-2586

Body & Assembly - Environmental Group

1. J. Gibson
   Office: (313) 845-2532
   Home: (313) 583-1090

2. G.T. Stevens - Environmental Control Dept. - Body & Assembly Division
   Office: (313) 327-8411
   Home: (313) 855-9581

3. A.M. Twilley - Environmental Control Dept. - Body & Assembly Division
   Office: (313) 594-1519
   Home: (313) 293-8946

Emergency Call List (continued)

Additional Support Can Be Obtained By Contacting;

Stationary Source Environmental Control Office
J. M. Reinke, (313) 594-0324

Plant Engineering Office,
S. H. Vaughn
(313) 568-4720

B. GOVERNMENT AGENCIES

The Plant Environmental Representative maintains the following list of government agencies to be notified as deemed necessary should a reportable spill incident occur.

1. U. S. Coast Guard National Response Center
   Washington, D.C.
   1-800-424-8802 (24 hour toll free reporting)
   if no answer (202) 426-2675
   Local Oil Spill Response
   Days: Area Code - 716, 846-4168
   Night: Area Code - 716, 846-4153

2. N.Y.S. Department of Environmental Conservation
   Regional Headquarters (Division of Water)
   600 Delaware Avenue
   Buffalo, New York 14202
   Area Code - 716, 847-4590
   Oil Spill Hot Line (24 hr.) 1-800-457-7362

In the event of a spill incident posing a serious hazard to property, public health or safety, the following agencies would also be notified:

3. Police Department
   501 South Park
   Hamburg Township
   Area Code 716, 648-5111

4. Woodlawn Vol. Fire Department, Inc.
   3280 Lakeshore Road
   Buffalo, New York 14219
   Area Code 716, 824-2284

5. Blasdell Sewage Treatment Plant
   Mile-Strip Road
   Area Code 716, 823-2214

6. Erie County Health Department, Water Reources
   95 Franklin Street
   Buffalo, New York
   Area Code 716, 846-7671

SECTION IV

DISCHARGE CONTINGENCY PLAN

SECTION IV: DISCHARGE CONTINGENCY PLAN

A. SUPERVISORY PERSONNEL

The Plant Maintenance Services Department has a Superintendent on duty 24 hours per day who would activate and supervise any clean up activities required after a spill incident, they could be reached at 821-4242 or by calling the Security Office at 821-4014.

B. The following commercial agents are available to assist the Plant in spill clean-up operations as necessary:

1. Superior Pipe Cleaning Inc.
S-3313 Woodlawn Ave.
Woodlawn, N.Y.
(716) 822-7500 if no answer (716) 876-8841
24 hr. service - Vacuum tankers to respond to spills, sorbent booms for containment of oil spills on water, excavation work and waste hauling capabilities.
Joe Arsenault 689-0290 - Phil Arsenault 877-5069

2. Elmwood Tank and Piping Corp. EPA ID NYDO 41037441
62 W. Market St.
Buffalo, N.Y. 14204
(716) 853-5960
24 hr. service, Capabilities for oil, chemical and hazardous material spill cleanup.

3. Wizard Method
1100 Connection Rd.
Niagara Falls, N.Y. 14304
(716) 692-8160
24 hr. service - Vacuum equipment (wet or dry) high pressure water cleaning

4. New England Pollution Control Co., Inc. EPA ID CTD 991288747
4814 Ellicott St. NYS ID CT-022
Batavia, N.Y. 14020
(716) 343-6444

24 hr. service - oil/hazardous materials spill control, cleanup and disposal.

SECTION IV: DISCHARGE CONTINGENCY PLAN

C. CONTAINMENT EQUIPMENT

The following equipment is owned by the Buffalo Stamping Plant and is available for containment in the event of a spill:

1a. (1) Mobile truck with vacuum pump-500 gal. tank, stored at col. V-32 when not in use.

1b. (1) Mobile truck with vacuum pump-300 gal. tank, stored at Col V-32 when not in use.

2. (2) Portable 55 gal. tanks equipped with air operated suction systems, stored in the Tool and Die Shop.

3. (1) Tractor with a front end bucket, stored at Col. A-9 when not in use.

4. (2) Scrubmobiles with 200 Gal. tanks, stored at Col. U-34

5. (1) Portable tank (200 gal) with air operated pump, stored at Col. V-32

6. (1) Portable tank (350 gal) with air operated pump, stored at Col V-32

7. (1) Brill oil skimmer (tube type) installed in the sanitary sewer line (northeast hourly parking lot).

8. (8) 10 ft. sections of oil sorbent boom (8" dia), stored in the ind. waste treatment control building.

9. (3) 27 lb. bales of oil sorbent particulate, stored in the industrial waste treatment control building.

SECTION V

PLANT INSPECTIONS

SECTION V: PLANT INSPECTIONS

A. ROUTINE INSPECTIONS

Monthly routine inspections are made of plant facilities which could conceivably contribute to a pollution incident. The Plant Environmental Representative is responsible for such inspections which he coordinates with maintenance and safety representatives. He particularly seeks out potential weaknesses before an incident or failure can occur. Attached, in section VII pg. 14, is a copy of the monthly check list.

B. SCHEDULED AUDITS

Audits of plant operations are conducted periodically by Stationary Source Environmental Control Office (SSECO), Ford Motor Company. The facility is inspected for compliance with environmental regulations and changes in preventative measures and maintenance procedures are recommmended. In addition, annual division audits are also conducted.

C. GOVERNMENT AGENCIES

Plant personnel have been instructed to admit government officials or their duly authorized representatives when visiting the plant and to comply fully with official request concerning such visits. A copy of this plan is maintained by plant management and is available for on-site review by representatives of the U.S. Environmental Protection Agency or the N.Y.S. Dept. of Environmental Conservation, by official request during normal working hours.

SECTION VI

PERSONNEL TRAINING

SECTION VI: PERSONNEL TRAINING

A. SPILL PREVENTION BRIEFINGS

Plant engineering and production personnel are periodically instructed as to spill prevention control and countermeasure procedures as regular plant safety briefings are conducted. Stationary Source Environmental Control Office and Management and Technical Training Department, General Serivces, has developed a Pollutant Spill Prevention Program consisting of two video-tape instruction and training sessions and accompanying supplemental written materials. The program is periodically presented to appropriate plant supervisory and hourly employes at this and other Ford Motor Company facilities on a circulating basis. The Evaluation and Standards Department, Plant Engineering Office, also occasionally publishes a "Maintenance Bulletin" for plant engineers regarding general preventive maintenance techniques such as the maintenance of pollution control equipment and waste water treatment systems.

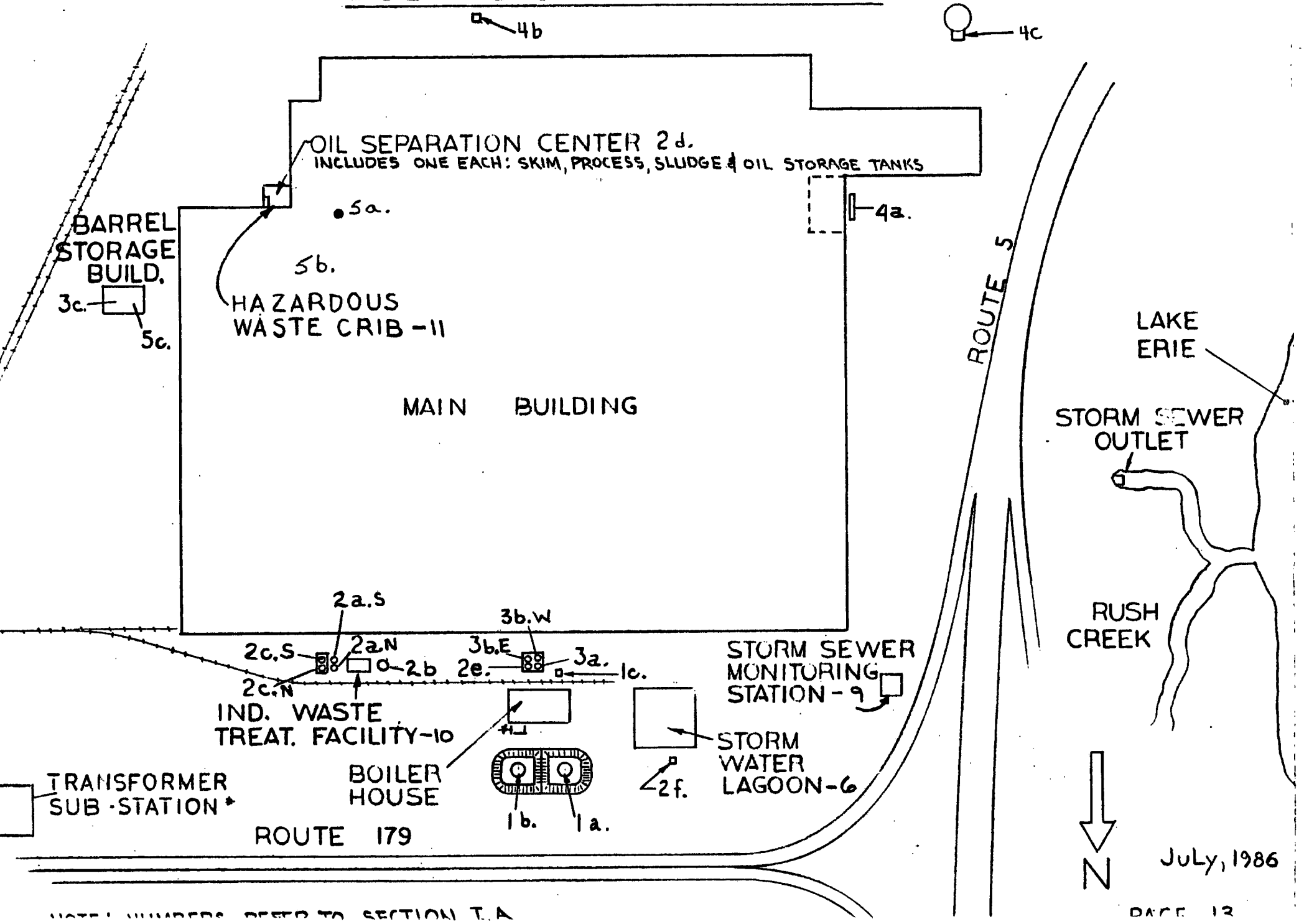
B. DISSEMINATION OF INFORMATION

Stationary Source Environmental Control Office also periodically distributes to affected Company divisions and plants information concerning federal, state, and local regulations, spill events, and recently developed precautionary measures.

SECTION VII

MISCELLANEOUS ATTACHMENTS

FORD MOTOR CO. BUFFALO STAMPING PLANT
BULK STORAGE FACILITIES



July, 1986

NOTE: NUMBERS REFER TO SECTION I.A

BUFFALO STAMPING PLANT

MONTHLY INSPECTION CHECK LIST

Tank Identification No.	Pipes & Fittings	Tank Shell	Related Pumps	Ground Area	Month: Remarks:
1. #6 Fuel Oil Storage					
a. 250,000 Gal.- west					
b. 250,000 Gal.- east					
2. Waste Oil and Sludge					
a. N.- 20,000 Gal. Batch Tank					
S.- 20,000 Gal. Batch Tank					
b. 30,000 Gal. Batch Tank					
c. N.- 10,000 Gal. Sludge					
S.- 10,000 Gal. Waste Oil					
d. Oil Separation Center					
1. Storage & Process Tanks					
2. (4) 1000 Gal. Process Storage					
3. (7) 1000 Gal. Reclaim Tanks					
e. 11,000Gal. Waste Oil(at the					
boiler house tank farm)					
f. 250 Gal. Lagoon Waste Oil					
3. Process Oils					
a. 11,000 Gal. Thread Oil					
b. E.- 11,000 Gal. Lube Oil					
W.- 11,000 Gal. Lube Oil					
c. 55 Gal. Drums - Barrel Bldg.					
4. Gasoline - Diesel Fuel					
a. 10,000 Gal. Gasoline - Unleaded					
b. 550 Gal. Diesel - Die Storage					
c. 350 Gal. Diesel - Fire Prot Tank					
5. Solvents & Degreasers					
a. Paint Solvent - Carp. Shop V-29					
b. (8) Degreasing Units					
c. Barrel Bldg. Storage Crib					
6. Storm Water Lagoon					
7. Storm Sewer Monitoring Station					
8. Storm Sewer Drainage Ditches					
9. Roads & Storage Areas					
10. Sorbent Material on Hand in The Ind. Waste Treat Facility					
11. Hazardous Waste Crib					

POLLUTION INCIDENT REPORT

2-14-77

Location of Spill: Ford Motor Company
Buffalo Stamping Plant
S-3663 Lake Shore Road
Blasdell, New York 14219

Water Courses Affected: Outfall to Rush Creek
leading to Lake Erie

Date of Incident: February 11, 1977

Weather Conditions:

Area is in the process of digging out of a record 172" snowfall. Rising temperatures has led to substantial snow melting. Temperatures - high 47 deg. low 23 deg. - mean 39 deg. F.

Cause:

Outside barrel storage and dumping operation, located along south wall of building has been covered by a heavy snow accumulation for approximately one month. Freezing temperatures and high winds have made normal operations impossible.

Normally, returnable empty barrels are accumulated on storage racks. Small amounts of lubricating oils remaining in bottom of barrels are drained into a 5,000 gallon underground storage tank. This tank is emptied by vendor as conditions warrant.

Sometime during the digging out operation, the curbed apron servicing the above tank was damaged, allowing oil to become engulfed in ice and snow. Daily snowfall and drifting snow made early detection impossible.

The last environmental inspection was conducted 1-27-77. At that time, nothing abnormal was observed. Area, in general, was covered with ice and snow, as was the outfall at Rush Creek. Only after several days of above freezing temperatures did subject oil spill come to light.

The (3) floating booms stretched across Rush Creek, because of the heavy accumulation of snow, were rendered ineffective, allowing water carrying oil over and around same. An estimate of quantity of pollutant reaching public waters is not possible under the aforementioned circumstances. It is believed to be less than 500 gallons.

Subject: Pollution Incident Report (continued)

Corrective Action Taken

Discovery was made during inspection of plant grounds, initially for possible flooding conditions. Monthly environmental inspection was simultaneously conducted by Plant Layout Engineer, A.W. Toth, who, in turn, reported same to Plant Layout Supervisor, W.F. Griep. After a personal inspection, the following management personnel were notified to set up containment and clean-up operations.

Plant Maintenance Services Manager	D.M. Carocci
Material Handling Manager	M.E. Toth
Plant Security Supervisor	R.A. Hall
Power House Engineer	R. Carrigg
Cleaner Foreman	T. Missert

It was determined that all materials stored in the immediate area contributing to the pollution problem be removed. After area was cleared, a snow removal, contractor was instructed to dig out ice and snow contaminated by oil. This in turn, was trucked to an area remote from storm sewers and allowed to dissipate.

A storm sewer manhole, located within the plant, was opened in an atempt to intercept run-off by using scavenger pumping equipment. Use of sawdust and absorbent pads was suggested as a means of soaking up standing oil around spill area.

Approximately 36 hours lapsed between discovery and completion of clean-up. A contractor was scheduled to drain 5,000 gallon storage tank on Monday, 2-14-77.

The U.S. Coast Guard and U.S. EPA offices were notified by telephone on Saturday, 2-12-77. Coast Guard personnel from Buffalo base visited site that same afternoon and again on Sunday and Monday.

Attempts were also made to notify N.Y.S. Department of Health and Divisional offices, but to no avail. They were contacted on Monday, 2-14-77.

Clean-up at Rush Creek site must be deferred until safe access to area can be realized. Snow bridges are currently beginning to collapse into waterway, but the general area still is covered by 15-20' high snow drifts.

As future action to prevent recurrence, a review of our methods and location of handling returnable barrels will be made. Secondly, a more reliable means of containing accidental spills must be engineered.

W.F. Griep

W. F. Griep
Environmental Representative
Buffalo Stamping Plant

WFG:lm

POLLUTION INCIDENT REPORT

7-8-77

Location of Spill: Ford Motor Company
Buffalo Stamping Plant
S-3663 Lake Shore Road
Buffalo, New York 14219

Water Courses Affected: Outfall to Un-named ditch
Leading to Lake Erie
Via Rush Creek

Date of Incident: July 5, 1977

Weather Conditions: Clearing after sustained rainy period

Csuse:

Oil accumulation from unknown sources is normally contained by an under flow dyke constructed in last manhole of storm sewer system located on plant property. Tube type skimmer was in continuous operation. Sustained rains, cause water to raise above normal operating levels, thus flushing out storm sewers.

Corrective Action Taken:

Daily inspection of (3) floating booms located at outfall to un-named ditch on Bethlehem Steel Property - revealed oil accumulation. Supervisor Pipe Cleaning Company was notified at 8:10 A.M,, and arrived at 2:30 P.M.

W. F. Griep

W. F. Griep
Environmental Representative
Buffalo Stamping Plant

WFG:pl

POLLUTION INCIDENT REPORT

April 5, 1978

Location of Alleged Spill:	Ford Motor Company Buffalo Stamping Plant S-3663 Lake Shore Road Blasdell, New York 14219
Water Courses Affected:	Outfall to Rush Creek leading to Lake Erie
Date of Alleged Incident:	Sunday,, 9:30 AM March 12, 1978

U. S. Coast Guard personnel came to Plant Protection Office to report presence of oil in Rush Creek outfall.

Richard Ranic was called from Pollution Control Building and accompanied Coast Guard to outfall. Water flow was at a minimum, floating booms were ineffective; consequently, some oil could flow around ends of creek banks.

Mr. Ranic told Coast Guard that he would call Superior Pipe Company to clean up creek. He checked creek at 2:30 PM and found oils had been removed.

At minimum water flow, it is hard to understand how oil, accumulated behind our storm sewer under flow dyke, could get into Rush Creek.

No further contact, verbal or written, has taken place since report of incident.

W. F. Griep
Environmental Representative
Buffalo Stamping Plant

WFG:lm

cc: R. W. Liddle - MSD
J. Gibson - MSD

POLLUTION INCIDENT REPORT

5-19-79

Location of Spill: Ford Motor Company
Buffalo Stamping Plant
S-3663 Lake Shore Road
Buffalo, New York 14219

Water Courses Affected: Outfall to Un-named ditch
Leading to Lake Erie
Via Rush Creek

Date of Incident: May 14, 1979

Weather Conditions: Clearing after over 1/2" Rainfall occurred

Cause:

Oil accumulation from unknown sources is normally contained by an underflow weir constructed in last manhole of storm sewer system located on Plant property. Tube type skimmer was in continuous operation. Rainy weather conditions on preceeding days cause water in storm sewers to raise above normal operating levels, here-by flushing out storm sewers

Corrective Action Taken:

Daily inspection of (3) floating booms located at outfall to un-named ditch on Bethlehem Steel Company property, revealed some oil accumulation. Superior Pipecleaning, Inc., our designated spill clean-up vendor, was on site at 11:00 A.M. till approx. 1:30 P.M.

W.F. Griep

WFG:pl

W. F. Griep
Environmental Representative
Buffalo Stamping Plant

Report of Contact

Subject: Alleged oil spill into Rush Creek

Date of Incident: September 19, 1985

Distribution:
J. P. Caine
R. Quale
L. A. Rastovac
J. Sternisha
J. R. Suyak
A. M. Twilley
J. VanDyke
D. R. Whitton

Summary:

Coast Guard Officer Patrick Daly arrived at the Buffalo Stamping Plant at approximately 7 P.M. on Sept. 19, 1985. He was here in regards to an oil accumulation at our storm sewer outfall, that was reported by a "concerned citizen". The apparent oil mixture, 1 or 2 gal., was contained by a steel dike and floating weir which had been installed by the Bethlehem Steel Corp., the property owner. Officer Daly indicated to J. Kaminski, Plant Maint. Superintendent that he wanted his supervisor to see the accumulation prior to any clean-up actions. Therefore, no clean-up attempt was made that evening. Mr. Kaminski notified R. N. Ebert, Alternate Environmental Representative, of the situation and Mr. Ebert inspected the outfall at 6:30 A.M. on Sept. 20, 1985. Mr. Ebert immediately contacted Superior Pipe Cleaning Co. to have the oil removed. He also contacted D. Karl of B&A to advise him of the situation. At approximately 11 A.M. on Sept. 20, Vincent J. Fininzio of the N.Y.S.-D.O.T. and Robert Leary of the N.Y.S.-D.E.C. arrived to inspect the outfall. They were accompanied by J. R. Suyak, Plant Maint. Services Mgr., J. Westerdale, Plant Maint. Superintendent and T. Missert, Cleaning Dept. Foreman. Upon their departure no further inspections were made, to the Plant's knowledge.

On Monday, Sept. 23, 1985, I inspected the outfall and discovered a slight oil accumulation again. Superior Pipe Cleaning Co. was called to remove the oil.

On Tuesday, Sept. 24, 1985, I called the Coast Guard Office and talked with Officer Patrick Daly. He said that since they had notified the Dept. of Transportation and Dept. of Environmental Conservation, they had no further involvement. I then called the Dept. of Transportation and talked with John Hennessey. Mr. Hennessey indicated that they were pleased with the Plant's response and clean-up operations and the situation would end without further repercussions. I asked Mr. Hennessey if we should also call the Dept. of Environmntal Conservation. He said that he sees them almost daily and that he would tell them of my follow-up call.

Further Action:

Inspections of the outfall will be continued daily by the Power House personnel, and accumulations of oil cleaned up by an outside vendor. Another effort wil be made to discover the source of the oil that is accumulating at the outfall. (Staff assistance is requested.)

By: A. W. Toth
Plant Environmental Representative

Date: Sept. 25, 1985

Report of Contact

Subject: Oil spill - ditch on Bethlehem Steel Co. property.

Date of Incident: May 27, 1986

Distribution:

R. J. Baker	J. R. Suyak
J. P. Caine	A. W. Toth
L. A. Rastovac	A. M. Twilley
J. A. Sternisha	J. Van Dyke

Summary:

Mr. David Brogan, powerhouse employee, contacted this writer on May 28, 1986 and informed him of the oil spill findings and clean up on the previuos day, May 27, 1986. Light oil was found on the daily inspection of the drainage ditch at the floating and steel weirs on the Bethlehem property. The oil did not get into Rush Creek and did not exceed (1) one gallon. No source could be determined. Mr. Donald Nunn, Superintendent and this writer inspected the site and found no oil.

On Thursday, May 29, I contacted Mr. Jeff Stevens BAO Environmental Representative, Mr. Dan Fournier U.S. Coast Guard and Mr. Robert Lacey NYS-DEC and informed them of the incident.

Further Action:

Inspection of the outfall will be continued daily by the Power House personnel, and accumulations of oil cleaned up by an outside vendor. Efforts will be made to discover the source of any oil that may be found at the outfall.

By: R. N. Ebert
Design Engineer

Date: June 2, 1986

POLLUTION INCIDENT REPORT

Location of Spill: Ford Motor Company
Buffalo Stamping Plant
S-3663 Lake Shore Road
Buffalo, N. Y. 14219

Date of Incident: June 1, 1986

Water Courses Affected: Drainage ditch leading to Rush Creek and then to Lake Erie.

Summary:

At approximately 10:00 a.m. Dave Brogan, a power house engineer, discovered a skim of oily material on the surface of the water at the plant outfall. Mr. Brogan reported the condition to Don Nunn, Maint. Services Superintendent, who then called Wayne Toth, Plant Environmental Representative, at his home. Mr. Toth arrived at the plant at 10:50 a.m. meeting Mr. Nunn at the Security Office. They proceeded to the Outfall and confirmed Mr. Brogan's report. Checking further down the creek showed that all the oily material was confined to an area within 30 ft. of the outfall. Upon returning to the plant, the last storm sewer manhole and storm water lagoon were checked for signs of the oily material. The lagoon was clear but a 3 ft. square skim of the same material was found in the storm sewer pipe leading from the lagoon.

Notification of the Spill was made as follows;

11:40 a.m. U. S. Coast Guard
11:45 a.m. N. Y. D.E.C.
11:50 a.m. J. F. Van Dyke - SSECO

Immediately after notifying the proper authorities an attempt to call a clean up contractor was made. Superior Pipecleaning Co. was called on an emergency number, however, he was not able to gather a crew together until Monday morning. Southgate Oil Services was called next, but there was no answer. Since a clean up contractor could not be contacted a clean up crew was assembled with plant employees.

Containment of the oily material was accomplished by placing a floating boom downstream. Clean up of the material was not possible because of various reasons including water depth, floating debris mixed with the oil and rakes which were too short and flimsy to remove the debris. Since the material was contained it was decided that we would wait for Superior Pipecleaning to come in and complete the clean up Monday morning. Superior Pipecleaning arrived at aprox. 8:00 a.m. on June 2,1986, removed all debris from the water surface and skimmed the oil from the water.

Further Action:

The source of the oil is not known, however, it is suspected that someone may have poured the material into a roof drain clean-out. Plant Maintenance Services will check all roof drain clean-out covers and weld them in place to preclude unauthorized dumping at these points. Inspections of the outfall will continue daily by the Power House personnel, and accumulations of oil will be cleaned up by an outside vendor. The Power House will establish an "Oil Containment Crib" and stock it with oil absorbent pads, rakes with extension handles, extra sections of floating boom etc. to improve plant clean up capabilities.

By: A. W. Toth
Plant Environmental Representative

Date: June 6, 1986

SECTION VIII

HAZARDOUS WASTE SUPPLEMENT

FORD MOTOR COMPANY

BUFFALO STAMPING PLANT

HAZARDOUS WASTE SUPPLEMENT

(Amendment to SPCC Plan)

RCRA ID No. - NYDO71474639

Section I Hazardous Wastes Activities Conducted

A. Hazardous Wastes Generated (See facility Site Plan for Locations)

1. Petroleum Naphtha from degreasing operations (E.P.A. waste code No. D001)

2. Contaminated Solvents from maintenance painting operations (EPA waste code D001)

3. Scrap Ignitron Tubes - containing mercury (U-151)

4. Spent Solutions of Penkay Case #1 cyanide (F 011)

5. Inhibited 1.1.1. Trichloroethane from degreasing operations (EPA waste code F001).

This facility is classified as a "small quantity generator" and preparation of this supplement is optional.

Section II Preparedness and Prevention

1. Required equipment - portable fire extinguishers and fire hoses are located in the vicinity of the container storage area. Adequate telephone access is within a short distance of all hazardous waste handling areas. Hand-held 2-way radios are not believed to be necessary.

2. Arrangements - with local authorities - the plant has forwarded a copy of this plan to the local police and fire department and has advised them of current on-site hazardous waste activities. Notification of local hospital authorities is not believed to be necessary.

3. Inspections - the plant has amended its inspection check-list (attached to this plan) to insure that the hazardous waste containers indentified above are inspected for leaks, deterioration, corrosion etc. at the frequency specified. Documentation is maintained at the plant for regulatory agency review.

Section III Contingency Plan and Emergency Procedures

The plant's emergency call list and discharge contingency plan may be found in Sections III and IV of this plan, respectively. Included are both Ford personnel as well as government agencies and outside contractors. A list of available emergency containment equipment is also provided in Section IV of plan.

Section IV Personnel Training

Personnel training applicable to hazardous waste activities was implemented at the facility prior to May 19, 1981. A comprehensive training program which complies with the specified elements of 40 CFR 265.16 was prepared by company management for implementation at the plant level. The training program is coordinated with the company's existing pollutant spill prevention program discussed in Section VI of this plan.

Prepared by: Plant Engineering & Desig
Section
Plant Maintenance Srvs
Buffalo Stamping Plant

July 1986